

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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Minnesota Chamber of Commerce, *a*  
*Minnesota nonprofit corporation,*

Plaintiff,

vs.

John Choi, *in his official capacity as*  
County Attorney for Ramsey County,  
Minnesota; George Soule, *in his official*  
*capacity as* Chair of the Minnesota  
Campaign Finance and Public Disclosure  
Board; David Asp, *in his official capacity*  
*as* Vice Chair of the Minnesota Campaign  
Finance and Public Disclosure Board;  
Carol Flynn, *in her official capacity as*  
Member of the Minnesota Campaign  
Finance and Public Disclosure Board;  
Margaret Leppik, *in her official capacity*  
*as* Member of the Minnesota Campaign  
Finance and Public Disclosure Board;  
Stephen Swanson, *in his official capacity*  
*as* Member of the Minnesota Campaign  
Finance and Public Disclosure Board; and  
Faris Rashid, *in his official capacity as*  
Member of the Minnesota Campaign  
Finance and Public Disclosure Board,

Defendants.

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Case No.: 0:23-cv-02015 (ECT/DJF)

**PLAINTIFF’S MOTION FOR  
PRELIMINARY INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65, Plaintiff Minnesota Chamber of Commerce (the “Chamber”) respectfully moves for a preliminary injunction enjoining Defendants from enforcing revised Minnesota Statute § 211B.15, subdivisions 4a and 4b. The Chamber’s Motion is brought based upon the pleadings, all of the files, records, and

proceedings herein, and the Chamber's Memorandum of Law and supporting declarations, which are being served and filed as directed by the applicable rules of practice.

Pursuant to Local Rule 7.1(d)(4), the Chamber respectfully requests that this preliminary injunction motion receive expedited handling.

Dated: October 24, 2023

**WINTHROP & WEINSTINE, P.A.**

*s/Thomas H. Boyd*

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